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page*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

**STIPULATION AND [PROPOSED]
SOURCE CODE PROTECTIVE ORDER**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Plaintiffs and the Meta Defendants (collectively, the “Parties”) hereby submit this Stipulation
2 and [Proposed] Source Code Protective Order.

3 **WHEREAS**, this Court entered the Stipulated Third Modified Protective Order on October 11,
4 2024 (Dkt. No. 1209).

5 **WHEREAS**, under Section 12.7 of the Stipulated Stipulated Modified Protective order, it “is not
6 intended to, and does not, govern the confidential treatment of Defendants’ Source Code,” and instead,
7 the parties “agree[d] to address the confidential treatment of Defendants’ Source Code in a separate
8 protective order.”

9 **WHEREAS**, the Parties have negotiated and agreed to a Source Code Protective Order.

10 **THEREFORE**, the Parties stipulate and respectfully request that the Court enter the [Proposed]
11 Source Code Protective Order.

12
13 Respectfully submitted,

14
15 DATED: February 27, 2025

By: /s/ Lexi J. Hazam

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17 *Zuckerberg*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Ashley M. Simonsen, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: February 27, 2025

/s/ Ashley M. Simonsen

Ashley M. Simonsen

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